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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

Oct 21, 2020

SEAN F. McAVOY, CLERK

9 UNITED STATES DISTRICT COURT
10 FOR THE EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 RUSSELL BRUCE CLARK and
15 LAWRENCE LEE WILLIAMS,

16 Defendants.

2:20-CR-127-TOR

INDICTMENT

Vio: 21 U.S.C. §§ 841(a)(1),
(b)(1)(A)(viii); 846:
Conspiracy to Distribute 50
Grams or More of Actual
(Pure) Methamphetamine
(Count 1)

21 U.S.C. § 841(a)(1),
(b)(1)(A)(viii):
Distribution of 50 Grams or
More of Actual (Pure)
Methamphetamine
(Count 2)

18 U.S.C. § 1952(a)(3)
Unlawful Use of Mail
(Counts 3, 5, 7)

21 U.S.C. §§ 841(a)(1),
(b)(1)(A)(viii); 846
Attempted Possession with
Intent to Distribute 50 Grams
or More of Actual (Pure)
Methamphetamine
(Counts 4, 6)

21 U.S.C. § 853
Forfeiture Allegations

The Grand Jury charges:

COUNT 1

Beginning on a date unknown, but by August 21, 2019 and continuing until on or about October 16, 2019, in the Eastern District of Washington and elsewhere, the Defendants, RUSSELL BRUCE CLARK and LAWRENCE LEE WILLIAMS, did knowingly and intentionally combine, conspire, confederate and agree together with each other and with other persons, both known and unknown, to commit the following offense: distribution of 50 grams or more of actual (pure) methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii), 846.

COUNT 2

On or about August 29, 2019, in the Eastern District of Washington, the Defendant, RUSSELL BRUCE CLARK, knowingly and intentionally distributed 50 grams or more of actual (pure) methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(viii).

COUNT 3

On or about August 29, 2019, in the Eastern District of Washington and elsewhere, the Defendant, LAWRENCE LEE WILLIAMS, used the mail with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is a business enterprise involving narcotics or controlled substances in violation of 21 U.S.C. § 841(a)(1), and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity, in violation of 18 U.S.C. § 1952(a)(3).

COUNT 4

Beginning on or about September 16, 2019, and continuing until on or about September 19, 2019, in the Eastern District of Washington, the Defendant, LAWRENCE LEE WILLIAMS, knowingly and intentionally attempted to possess with intent to distribute 50 grams or more of actual (pure) methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii); 846.

COUNT 5

Beginning on or about September 16, 2019, and continuing until on or about September 19, 2019, in the Eastern District of Washington and elsewhere, the Defendant, LAWRENCE LEE WILLIAMS, used the mail with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is a business enterprise involving narcotics or controlled substances in violation of 21 U.S.C. § 841(a)(1), and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity, in violation of 18 U.S.C. § 1952(a)(3).

COUNT 6

Beginning on or about October 7, 2019, and continuing until on or about October 10, 2019, in the Eastern District of Washington, the Defendant, LAWRENCE LEE WILLIAMS, knowingly and intentionally attempted to possess with intent to distribute 50 grams or more of actual (pure) methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii); 846.

COUNT ~~6~~ 7 PK

Beginning on or about October 7, 2019, and continuing until on or about October 10, 2019, in the Eastern District of Washington and elsewhere, the

1 Defendant, LAWRENCE LEE WILLIAMS, used the mail with the intent to
2 promote, manage, establish, carry on and facilitate the promotion, management,
3 establishment and carrying on of an unlawful activity, that is a business enterprise
4 involving narcotics or controlled substances in violation of 21 U.S.C. § 841(a)(1),
5 and thereafter performed and attempted to perform an act to promote, manage,
6 establish and carry on, and to facilitate the promotion, management, establishment
7 and carrying on of such unlawful activity, in violation of 18 U.S.C. § 1952(a)(3).

8
9 NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

10 The allegations contained in this Indictment are hereby re-alleged and
11 incorporated by reference for the purpose of alleging forfeitures.

12 Pursuant to 21 U.S.C. § 853, upon conviction of an offense in violation of 21
13 U.S.C. §§ 841(a)(1) and 846, as set forth in Counts 1, 2, 4, and 6 of this
14 Indictment, the Defendants, RUSSELL BRUCE CLARK and LAWRENCE LEE
15 WILLIAMS, shall forfeit to the United States of America any property
16 constituting, or derived from, any proceeds obtained, directly or indirectly, as a
17 result of such offense(s) and any property used or intended to be used, in any
18 manner of part, to commit or to facilitate the commission of the offense(s),
19 including but not limited to:

20 Defendant RUSSELL BRUCE CLARK (Counts 1–2):

21 MONEY JUDGMENT

22 A sum of money equal to \$2,400.00 in United States currency
23 representing the total amount of proceeds obtained from the controlled
24 substance offenses.

25 If any of the property described above, as a result of any act or omission of
26 the Defendants:

- 27 a. cannot be located upon the exercise of due diligence;
28 b. has been transferred or sold to, or deposited with, a third party;
c. has been placed beyond the jurisdiction of the court;

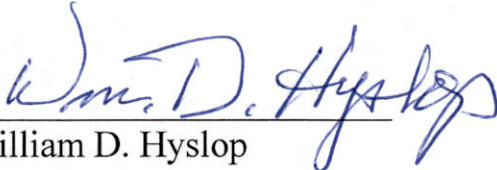
1 d. has been substantially diminished in value; or

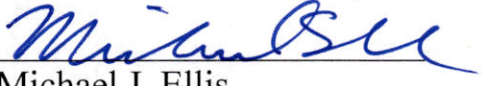
2 e. has been commingled with other property which cannot be divided
3 without difficulty;

4 the United States of America shall be entitled to forfeiture of substitute property
5 pursuant to 21 U.S.C. § 853(p).

6 DATED this 20 day of October, 2020.

7 A TRUE BILL

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14 United States Attorney

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17 Michael J. Ellis
18 Assistant United States Attorney
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